
From: Elaine Maskevich

Sent: Wednesday, December 21, 2016 3:24 PM

To: 'rwb@gknet.com' <rwb@gknet.com>; 'mark.oconnor@gknet.com' <mark.oconnor@gknet.com>; 'paul.stoller@gknet.com' <paul.stoller@gknet.com>; 'rlopez@lopezmchugh.com' <rlopez@lopezmchugh.com>; 'Marilyn Wass' <mwass@lopezmchugh.com>; 'wespitia@lopezmchugh.com' <wespitia@lopezmchugh.com>; rand_nolen@fleming-law.com

Cc: FILTER PPF PFS <FilterPPF-PFS@nelsonmullins.com>; Richard North <richard.north@nelsonmullins.com>

Subject: Johnisha Wright v. C.R. Bard, et al., Case No. MDL-15-02641PHX-DGC - Plaintiff Profile Form Overdue Letter

Dear Counsel:

Please see the attached Plaintiff Profile Form Overdue Letter in the above-referenced case. Hardcopies are being sent to your respective offices via U.S. Mail.

Elaine Maskevich

Paralegal

Nelson Mullins Riley & Scarborough LLP

3600 Maclay Boulevard South, Suite 202 Tallahassee, FL 32312

elaine.maskevich@nelsonmullins.com Off: 850.907.2506 Fax: 850.907.2556

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law
Atlantic Station / 201 17th Street, NW / Suite 1700 / Atlanta, GA 30363
Tel: 404.322.6000 Fax: 404.322.6397
www.nelsonmullins.com

Sanjay Ghosh
Tel: 404.322.6282
Fax: 404.322.6050
sanjay.ghosh@nelsonmullins.com

December 21, 2016

VIA EMAIL AND U.S. MAIL

Robert R. Boatman
Mark S. O'Connor
Paul Stoller
Gallagher & Kennedy, P.A.
2575 East Camelback Road, Suite 1100
Phoenix, Arizona 85016
rwb@gknet.com
paul.stoller@gknet.com
mark.oconnor@gknet.com

Rand P. Nolen, Esq.
Fleming Nolen & Jez LLP
2800 Post Oak Blvd., Ste 4000
Houston TX 77056-6109
rand_nolen@flaming-law.com

Ramon Lopez
Matthew Lopez
Lopez McHugh, LLP
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660
rlopez@lopezmchugh.com
mlopez@lopezmchugh.com

Re: *Johnisha Wright v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)
Plaintiff's Profile Form for Johnisha Wright

Dear Counsel,


This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than December 11, 2016; however, we still have not received a PPF for your client.

Please send a PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the

Gallagher & Kennedy, P.A.
Lopez McHugh, LLP
Fleming Nolen & Jez LLP
December 21, 2016
Page 2

Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,



Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

SG/

From: Elaine Maskevich

Sent: Friday, February 3, 2017 3:29 PM

To: 'rwb@gknet.com' <rwb@gknet.com>; 'mark.oconnor@gknet.com' <mark.oconnor@gknet.com>; 'paul.stoller@gknet.com' <paul.stoller@gknet.com>; 'rlopez@lopezmchugh.com' <rlopez@lopezmchugh.com>; 'Marilyn Wass' <mwass@lopezmchugh.com>; 'wespitia@lopezmchugh.com' <wespitia@lopezmchugh.com>; rand_nolen@flaming-law.com

Cc: FILTER PPF PFS <FilterPPF-PFS@nelsonmullins.com>; Richard North <richard.north@nelsonmullins.com>

Subject: Johnesha Wright v. C.R. Bard, et al., Case No. MDL-15-02641PHX-DGC - Plaintiff Profile Form Overdue Letter

Dear Counsel:

Please see the attached Plaintiff Profile Form Overdue Letter in the above-referenced case. Hardcopies are being sent to your respective offices via U.S. Mail.

Nelson Mullins

Elaine Maskevich

Paralegal

elaine.maskevich@nelsonmullins.com

**Nelson Mullins Riley & Scarborough
LLP**

3600 Maclay Blvd. South, Suite 202

Tallahassee, Florida 32312

Tel: 850.907.2506

Fax: 850.907.2556

www.nelsonmullins.com

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

Atlantic Station / 201 17th Street, NW / Suite 1700 / Atlanta, GA 30363

Tel: 404.322.6000 Fax: 404.322.6397

www.nelsonmullins.com

Sanjay Ghosh

Tel: 404.322.6282

Fax: 404.322.6050

sanjay.ghosh@nelsonmullins.com

February 3, 2017

VIA EMAIL AND U.S. MAIL

Robert R. Boatman
Mark S. O'Connor
Paul Stoller
Gallagher & Kennedy, P.A.
2575 East Camelback Road, Suite 1100
Phoenix, Arizona 85016
rwb@gknet.com
paul.stoller@gknet.com
mark.oconnor@gknet.com

Rand P. Nolen, Esq.
Fleming, Nolen & Jez LLP
2800 Post Oak Blvd., Ste 4000
Houston TX 77056-6109
rand_nolen@fleming-law.com

Ramon Lopez
Matthew Lopez
Lopez McHugh, LLP
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660
rlopez@lopezmchugh.com
mlopez@lopezmchugh.com

Re: *Johnesha Wright v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)

Plaintiff's Profile Form for Johnesha Wright

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than December 11, 2016; however, we still have not received a PPF for your client.

Gallagher & Kennedy, P.A.
Lopez McHugh, LLP
Fleming, Nolen & Jez LLP
February 3, 2017
Page 2

This is the second overdue letter we are sending since we have not received a response to the first one. Please send a PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Sanjay Ghosh', with a stylized flourish extending from the end.

Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

SG/

From: Elaine Maskevich

Sent: Tuesday, May 23, 2017 1:57 PM

To: 'rwb@gknet.com' <rwb@gknet.com>; 'mark.oconnor@gknet.com' <mark.oconnor@gknet.com>; 'paul.stoller@gknet.com' <paul.stoller@gknet.com>; 'rlopez@lopezmchugh.com' <rlopez@lopezmchugh.com>; 'Marilyn Wass' <mwass@lopezmchugh.com>; 'wespitia@lopezmchugh.com' <wespitia@lopezmchugh.com>; rand_nolen@fleming-law.com

Cc: FILTER PPF PFS <FilterPPF-PFS@nelsonmullins.com>; Richard North <richard.north@nelsonmullins.com>

Subject: Johnisha Wright v. C.R. Bard, et al., Case No. MDL-15-02641PHX-DGC - Plaintiff Profile Form Overdue Letter

Dear Counsel:

Please see the attached Plaintiff Profile Form Overdue Letter in the above-referenced case. Hardcopies are being sent to your respective offices via U.S. Mail.

Nelson Mullins

Elaine Maskevich

Paralegal

elaine.maskevich@nelsonmullins.com

**Nelson Mullins Riley & Scarborough
LLP**

3600 Maclay Blvd. South, Suite 202

Tallahassee, Florida 32312

Tel: 850.907.2506

Fax: 850.907.2556

www.nelsonmullins.com

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

Atlantic Station / 201 17th Street, NW / Suite 1700 / Atlanta, GA 30363

Tel: 404.322.6000 Fax: 404.322.6397

www.nelsonmullins.com

Sanjay Ghosh

Tel: 404.322.6282

Fax: 404.322.6050

sanjay.ghosh@nelsonmullins.com

May 23, 2017

VIA EMAIL AND U.S. MAIL

Robert R. Boatman
Mark S. O'Connor
Paul Stoller
Gallagher & Kennedy, P.A.
2575 East Camelback Road, Suite 1100
Phoenix, Arizona 85016
rwb@gknet.com
paul.stoller@gknet.com
mark.oconnor@gknet.com

Rand P. Nolen, Esq.
Fleming Nolen & Jez LLP
2800 Post Oak Blvd., Ste 4000
Houston TX 77056-6109
Rand_nolen@fleming-law.com

Ramon Lopez
Matthew Lopez
Lopez McHugh, LLP
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660
rlopez@lopezmchugh.com
mlopez@lopezmchugh.com

Re: *Johnisha Wright v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)

Plaintiff's Profile Form for Johnisha Wright

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than December 11, 2016; however, we still have not received a PPF for your client.

Gallagher & Kennedy, P.A.
Lopez McHugh, LLP
Fleming Nolen & Jez LLP
May 23, 2017
Page 2

This is the third overdue letter we are sending since we have not received a response to the others. The defendants will move to dismiss the Complaint if a PPF is not received within 10 days from the date of this letter. See Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,

A handwritten signature in black ink, appearing to be "Sanjay Ghosh", with a long horizontal stroke extending to the right.

Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

SG/

From: Elaine Maskevich

Sent: Monday, September 18, 2017 12:02 PM

To: 'rwb@gknet.com' <rwb@gknet.com>; 'mark.oconnor@gknet.com' <mark.oconnor@gknet.com>; 'paul.stoller@gknet.com' <paul.stoller@gknet.com>; 'rlopez@lopezmchugh.com' <rlopez@lopezmchugh.com>; 'Marilyn Wass' <mwass@lopezmchugh.com>; 'wespitia@lopezmchugh.com' <wespitia@lopezmchugh.com>; gay.mennuti@gknet.com; rand_nolen@fleming-law.com

Cc: FILTER PPF PFS <FilterPPF-PFS@nelsonmullins.com>; Richard North <richard.north@nelsonmullins.com>

Subject: Johnisha Wright v. C.R. Bard, et al., Case No. MDL-15-02641PHX-DGC - Plaintiff Profile Form Overdue Letter

Dear Counsel:

Please see the attached Plaintiff Profile Form Overdue Letter in the above-referenced case. Hardcopies are being sent to your respective offices via U.S. Mail.

Nelson Mullins

Elaine Maskevich

Paralegal

elaine.maskevich@nelsonmullins.com

**Nelson Mullins Riley & Scarborough
LLP**

3600 Maclay Blvd. South, Suite 202

Tallahassee, Florida 32312

Tel: 850.907.2506

Fax: 850.907.2556

www.nelsonmullins.com

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law
Atlantic Station / 201 17th Street, NW / Suite 1700 / Atlanta, GA 30363
Tel: 404.322.6000 Fax: 404.322.6397
www.nelsonmullins.com

Sanjay Ghosh
Tel: 404.322.6282
Fax: 404.322.6050
sanjay.ghosh@nelsonmullins.com

September 18, 2017

VIA EMAIL AND U.S. MAIL

Mark S. O'Connor
Paul Stoller
Gallagher & Kennedy, P.A.
2575 East Camelback Road, Suite 1100
Phoenix, Arizona 85016
paul.stoller@gknet.com
mark.oconnor@gknet.com

Rand P. Nolen
Fleming Nolen & Jez LLP
2800 Post Oak Blvd., Ste 4000
Houston TX 77056-6109
Rand_nolen@fleming-law.com

Ramon Lopez
Matthew Lopez
Lopez McHugh, LLP
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660
rlopez@lopezmchugh.com
mlopez@lopezmchugh.com

Re: *Johnisha Wright v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)
Plaintiff's Profile Form for Johnisha Wright

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than December 11, 2016, however, we still have not received a PPF for your client.

This is the fourth overdue letter we are sending since we have not received a response to any of the others which were sent to you on December 21, 2016, February 3, 2017, and again on May 23, 2017. Please send a PPF with the missing information as soon as possible, but no later than 7 days from the date of this letter. The defendants will move to dismiss the

Gallagher & Kennedy, P.A.
Lopez McHugh, LLP
Fleming Nolen & Jez LLP
September 18, 2017
Page 2

Complaint if a PPF is not received within 7 days from the date of this letter. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,

A handwritten signature in black ink that reads "Sanjay Ghosh". The signature is written in a cursive, flowing style.

Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

SG/